UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS, ET AL.,

Plaintiffs,

Case No. 1:25-cv-10685 (WGY)

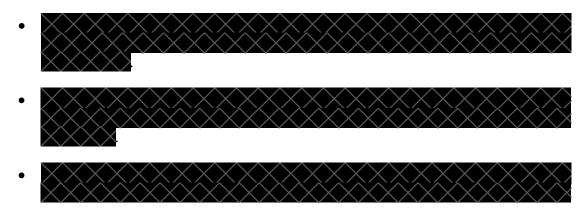
v.

MARCO RUBIO, ET AL.,

Defendants.

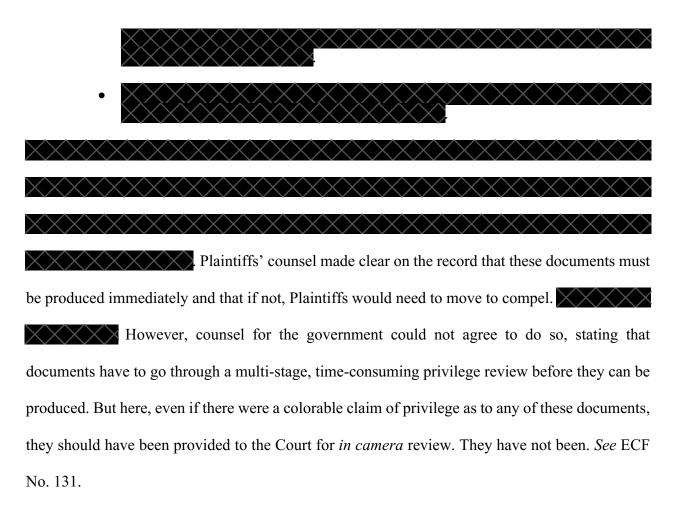
PLAINTIFFS' ADDENDUM TO MOTION TO COMPEL COMPLETE ANSWERS TO PLAINTIFFS' INTERROGATORIES, PRODUCTION OF DOCUMENTS, AND DISCLOSURE OF INFORMATION IMPROPERLY WITHHELD AS PRIVILEGED

Plaintiffs file this brief addendum to their Motion to Compel that was filed yesterday, June 24, 2025, in order to inform the Court of additional highly relevant information that is missing from Defendants' document productions and that Plaintiffs first learned about during yesterday's deposition of Stuart Wilson, a State Department official. Mr. Wilson, the Deputy Assistant Secretary in charge of the Visa Office in the Bureau of Consular Affairs, testified that:



¹ Protecting the United States from Foreign Terrorists and Other National Security and Public Safety Threats ("E.O. 14161"), The White House (Jan. 20, 2025), https://perma.cc/TJ33-ET28; Additional Measures to Combat Anti-Semitism ("E.O. 14188"), The White House (Jan. 29, 2025), https://perma.cc/7XT9-QHXY.

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Plaintiffs respectfully request that the Court order Defendants to produce these documents, in addition to the documents identified in Plaintiffs' Motion to Compel.

June 25, 2025	Respectfully submitted,
	/s/ Scott Wilkens
Edwina Clarke (BBO 699702)	Scott Wilkens
David Zimmer (BBO 692715)	Ramya Krishnan

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2025, I filed Plaintiffs' Addendum to Motion to Compel Complete Answers to Plaintiffs' Interrogatories, Production of Documents, and Disclosure of Information Improperly Withheld as Privileged, and that service will be accomplished by the CM/ECF system.

June 25, 2025 /s/ Scott Wilkens

Scott Wilkens

Counsel for Plaintiffs